



EXHIBIT 9

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DREW J. RIBAR, Pro Se
Plaintiff,

v.

WASHOE COUNTY, NEVADA, et al.,
Defendants.

Case No.: 3:24-cv-00526-ART-CLB

EXHIBIT 9

Title: Internal Communications Between Washoe County Library System and Reno Gazette-Journal

Date of Document: February 28, 2023

Bates Range: EXH040 – EXH044

DESCRIPTION:

This exhibit consists of internal emails and communications between the **Washoe County Library System (WCLS)** and the **Reno Gazette-Journal (RGJ)** regarding press coverage of Drag Queen Story Hour (DQSH) events. The content of these communications reveals WCLS's **preferential treatment toward specific media outlets** while restricting access to independent journalists, including Plaintiff.

PLEADING TITLE - 1

1 These emails provide clear evidence of unconstitutional viewpoint discrimination and media
2 manipulation, in violation of the First and Fourteenth Amendments. These records further
3 support Plaintiff's 42 U.S.C. § 1983 claims for free speech and due process violations.
4

5 6 7 **RELEVANT CASE LAW:**

8 9 **1. First Amendment - Viewpoint Discrimination:**

- 10 ○ *Perry Educ. Ass'n v. Perry Local Educators' Ass'n*, 460 U.S. 37, 48 (1983)
11 (government cannot discriminate based on viewpoint in public forums).
12 ○ *Kreimer v. Bureau of Police for Morristown*, 958 F.2d 1242, 1262 (3d Cir. 1992)
13 (libraries as designated public forums with heightened First Amendment
14 protection).
15

16 **2. Government Control Over Press Access:**

- 17 ○ *Sherrill v. Knight*, 569 F.2d 124 (D.C. Cir. 1977) (government cannot arbitrarily
18 grant press access to some while denying it to others without clear, non-
19 discriminatory standards).
20 ○ *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964) (government restrictions on
21 journalists implicate freedom of the press).
22

23 **3. Fourteenth Amendment - Due Process Violations:**

- 24 ○ *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976) (government decisions affecting
25 access must afford procedural due process).
26
27
28

- *Armstrong v. D.C. Pub. Library*, 154 F. Supp. 2d 67, 77 (D.D.C. 2001) (libraries must provide adequate due process before banning patrons).

CERTIFICATE OF AUTHENTICITY

I, **Drew J. Ribar**, certify under penalty of perjury under the laws of the United States that the attached **Exhibit 9** is a **true and correct copy** of official government records obtained through public records requests and case discovery.

Dated: March 17, 2025

Respectfully submitted,

/s/ **Drew J. Ribar**
3480 Pershing Ln.
Washoe Valley, NV 89704
(775) 223-7899
Const2Audit@gmail.com

From: Robison, Mark <MDRobison@reno.gannett.com>
Sent: 28 February 2023 20:23
To: Hemingway, Jamie
Cc: Drysdale, Bethany; Scott, Jeff
Subject: RE: RGJ - library and drag queen story hour
Attachments:

Perfect, thanks!

Mark Robison

Local Government Reporter and Community Engagement Director

PART OF THE USA TODAY NETWORK

• Cell: 775-470-0400

From: Hemingway, Jamie <JHemingway@washoecounty.gov>
Sent: Tuesday, February 28, 2023 12:21 PM
To: Robison, Mark <MDRobison@reno.gannett.com>
Cc: Drysdale, Bethany <BDrysdale@washoecounty.gov>; Scott, Jeff
<jscott@washoecounty.gov>
Subject: Re: RGJ - library and drag queen story hour

Hi Mark,

Including the NRS statue to clarify who has oversight of library programming in Washoe County:

<https://washoecountynv.qscend.com/311/knowledgebase/article/32511>

Powers and Duties of Librarian

By Nevada statute, the Washoe County Board of Commissioners does not have oversight of the programming through the Washoe County Library System due to the following NRS:

• **NRS 379.027 Powers and duties of librarian.** The librarian of any consolidated, county, district or town library shall administer all functions of the library, employ assistants and carry out the policies established by the trustees of the library, and may recommend policies to the trustees.

EXH 040

(Added to NRS by 1959, 328; A 1967, 1061; 1981, 1000; 1985, 10)

· The Board of Trustees of the Washoe County Library System in, accordance with NRS 379.022, is responsible for governing the operations of the Washoe County Library System. All questions, or comments regarding any programming decisions should be directed to Library Director Jeff Scott, jscott@washoecounty.gov

Thanks again,

Jamie

Jamie Hemingway

Interim Public Information and Development Officer | Washoe County Library System

jhemingway@washoecounty.gov | Office: 775-327-8360

301 South Center Street, Reno, NV 89501

From: Robison, Mark <MDRobison@reno.gannett.com>&
Sent: Tuesday, February 28, 2023 12:14 PM
To: Hemingway, Jamie <JHemingway@washoecounty.gov>&
Cc: Drysdale, Bethany <BDrysdale@washoecounty.gov>&
Subject: RE: RGJ - library and drag queen story hour

[NOTICE: This message originated outside of Washoe County -- **DO NOT CLICK** on links or open attachments unless you are sure the content is safe.]

This is great, Jamie, thanks! Just one last thing to verify: Does the board of county commissioners have any say over library programming?

—
Mark Robison

Local Government Reporter and Community Engagement Director

EXH041

PART OF THE USA TODAY NETWORK

- Cell: 775-470-0400

From: Hemingway, Jamie <JHemingway@washoecounty.gov>;

Sent: Tuesday, February 28, 2023 12:05 PM

To: Drysdale, Bethany <BDrysdale@washoecounty.gov>; Robison, Mark <MDRobison@reno.gannett.com>; Scott, Jeff <jscott@washoecounty.gov>;

Subject: Re: RGJ - library and drag queen story hour

Good afternoon,

I have some answers for Mark from Library Director Jeff Scott--

- Does the library system currently have any drag queen story hours scheduled? If so, when and where?

We don't have dates set for Drag Story Hour. We plan to have our Drag Story Hour this summer.

- Does it have a statement on why it does these that you can link me to or send me, as far as why it's doing them?

We have a presentation about the Drag Story Hour program available on the website:

<https://www.washoecountylibrary.us/files/pdf/WCLS%20Drag%20Queen%20Storytime%20Presentation%20and%20Discussion%202022.pdf> and recording of presentation (which includes Blue Clues Pride Parade and our Virtual Drag Queen Storytime)

<https://www.youtube.com/watch?v=McQC2BiB2hI>

- Does it vet drag queens for concerns of working with children? If so, what does it check?

All library volunteers have a standard criminal background check. Chris Daniels is a beloved member of our community who previously ran Good Luck MacBeth Theater and who has also been background checked to work with children and the school district.

- Are drag queens who have done or will do drag queen story hour at a library paid for with county money?

Drag Queen performers are not paid with County funds. The Friends of Washoe County Library nonprofit provides support. They paid \$400 for the four story times we had last year.

Ex 17042

Please let me know if you are in need of any additional information.

Thanks,

Jamie Hemingway

Jamie Hemingway

**Interim Public Information and Development Officer | Washoe County
Library System**

jhemingway@washoecounty.gov | Office: 775-327-8360

301 South Center Street, Reno, NV 89501

From: Drysdale, Bethany <BDrysdale@washoecounty.gov>
Sent: Tuesday, February 28, 2023 11:40 AM
To: Robison, Mark <MDRobison@reno.gannett.com>
Cc: Hemingway, Jamie <JHemingway@washoecounty.gov>
Subject: RE: RGJ - library and drag queen story hour

Hi Mark – I'm looping in Jamie Hemingway with the Library System. She can speak for the libraries.
Jamie, please see below. Deadline 2 p.m.

Thanks,
Bethany

Bethany Drysdale

Media and Communications Manager | Office of the County Manager

bdrysdale@washoecounty.gov | Office: 775.328.2070 | Cell: 775.313.8582

1001 E 9th Street, Building A, Reno, NV 89512

From: Robison, Mark <MDRobison@reno.gannett.com>
Sent: Tuesday, February 28, 2023 11:21 AM
To: Drysdale, Bethany <BDrysdale@washoecounty.gov>
Subject: RGJ - library and drag queen story hour

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attachments unless you are sure the content is safe.]

EXH 043

Here are my questions related to public comment at today's BCC regarding drag queen story hour at the Washoe County library system:

- Does the library system currently have any drag queen story hours scheduled? If so, when and where?
- Does it have a statement on why it does these that you can link me to or send me, as far as why it's doing them?
- Does it vet drag queens for concerns of working with children? If so, what does it check?
- Are drag queens who have done or will do drag queen story hour at a library paid for with county money?

Deadline: 2 p.m. (Please answer what questions you can by then. We can catch up later on anything else.)

Thanks!

Mark Robison

Local Government Reporter and Community Engagement Director

PART OF THE USA TODAY NETWORK

- Cell: 775-470-0400
- Subscribe (free): Greater Reno weekly newsletter rounding up my stories
- Facebook: GreaterReno
- Email: mrobison@rgj.com
- Support: Click here to donate to help maintain local government reporting without concern for commercial reward. 100% of donations go to my wages. My position is nonprofit and all stories are free to view (without paywall) as a public good. Any support, small or large, is much appreciated.

EXH044